

<b>Policy Category</b>	<b>Corporate – General</b>	<b>C&amp;B Ref.</b>	NA	<b>Policy No.</b>	<b>B1-4</b>
<b>Title</b>	<b>Privacy Policy</b>				
<b>Revises</b>	NA	<b>Revision Date:</b>			
<b>Effective Date</b>	<b>March 4, 2004</b>				

## Purpose:

Community Social Services Employers' Association (CSSEA)'s privacy policy outlines the principles and procedures for safeguarding the confidentiality and security of member, associate, and employee personal information.

The policy is based on the Canadian Standards Association (CSA) Model Code for the Protection of Personal Information (CAN/CSA-Q830-96) and the Personal Information Protection Act (PIPA) (Bill 38-2003).

## Scope

The policy applies to the collection, use, disclosure, and management of personal information about CSSEA's members, associates, and employees that are not incorporated. It does not apply to corporate or commercial entities that are members or associates.

## Definitions

*Collection* – the act of gathering, acquiring, or obtaining personal information from any source, including third parties, by any means.

*Consent* – voluntary agreement with what is being done or proposed. Consent can be either express or implied. Express consent can be given either orally or in writing; it is unequivocal and does not require inference on the part of CSSEA. Implied consent exists when CSSEA can reasonably infer consent based on action or inaction of the individual.

*Disclosure* – the act of making personal information available to a third party.

*Use* – the treatment, handling and management of personal information by and within CSSEA.

*Employee* – an employee of CSSEA

*Personal Information* – information about an individual that is identifiable and recorded in any form, excluding the name, position name or title, business telephone number, business address, business email or business facsimile number of the individual. For an employee, such information includes information found in individual employment files, performance appraisals, and medical and benefits information.

*Third Party* – an individual or organization other than CSSEA, the member, associate or employee.

# Principles

## 1. Accountability

- a. CSSEA is responsible for all personal information under its control.
- b. Responsibility for the protection of personal information and compliance with this policy rests with CSSEA's Privacy Officer, even though other individuals may be responsible for the day-to-day collection and processing of personal information. Other individuals may be delegated to act on behalf of the Privacy Officer.
- c. CSSEA has developed policies and procedures to: protect personal information, receive and respond to complaints and inquiries regarding personal information, and train staff and communicate the personal information policies and procedures to members, associates, and staff.

## 2. Identifying Purposes

- a. CSSEA shall identify the purpose for collecting personal information at or before the time is collected, either orally or in writing.
- b. Unless required by law, CSSEA shall not use or disclose for any new purpose, personal information previously collected, without identifying the new purpose and obtaining the consent of the individual if required.

## 3. Consent

- a. CSSEA shall obtain the consent of the individual required for the collection, use, or disclosure of personal information, except where it would be inappropriate or is required by law.
- b. An individual's consent may be express, implied, or given through an authorized representative such as a legal guardian, lawyer, or person having power of attorney.
- c. An individual may withdraw consent at any time, subject to legal or contractual restrictions, provided CSSEA is given reasonable notice.

## 4. Limits for Collection

- a. CSSEA shall only collect personal information for the purposes identified and use only methods of collection, which are fair and lawful.

## 5. Limits for Use, Disclosure, and Retention

- a. Personal information will only be used for the purposes for which it was collected, except with the consent of the individual or as required by law.
- b. CSSEA shall retain personal information only as long as necessary or expected to be necessary for the fulfillment of identified purposes or as required by law.

## **6. Accuracy**

- a. CSSEA shall make reasonable efforts to ensure personal information is accurate, complete, and current as necessary for the identified purposes.
- b. CSSEA shall not routinely update personal information unless it is necessary to fulfill the purposes for which the information was collected.

## **7. Safeguards**

- a. CSSEA will safeguard personal information appropriate to the sensitivity of the information to prevent its loss or theft, as well as unauthorized access, disclosure, copying, use or modification, regardless of the format in which it is held.
- b. CSSEA shall use appropriate security measures when disposing of personal information.

## **8. Openness**

- a. CSSEA is open about the policies and procedures it uses to protect personal information. Information about these policies and procedures will be made available to individuals either in electronic or written format.
- b. The following information will be made available:
  - i. The name, title, and address of the person accountable for the policies and procedures and to whom complaints or inquiries can be forwarded.
  - ii. A description of the type of personal information held by CSSEA, including a general account of its use.
  - iii. A copy of any brochures or other information that explain the policies and procedures.
  - iv. An explanation of what personal information is provided to related organizations.

## **9. Individual Access**

- a. Upon request, CSSEA shall within a reasonable time period, inform an individual of the existence, use, and disclosure of his or her personal information and shall provide access to that information.
- b. Individuals may be asked to be specific about the information they would like access to and to submit their request in writing or electronically.
- c. CSSEA shall make the information available within 30 days or provide written notice of extension where additional time is required to fulfill the request.
- d. If a request is refused, CSSEA shall notify the individual in writing, documenting the reasons for refusal and resources for recourse available to the individual.
- e. If the information is successfully demonstrated to be inaccurate or incomplete, CSSEA shall amend the information as required. Where appropriate, the amended information shall be transmitted to third parties having access to the information in question.

**10. Challenging Compliance**

- a. An individual shall be able to direct any complaints, concerns or questions regarding this privacy policy in writing or electronically to the Privacy Officer. If the Privacy Officer is unable to address the individual's concern, the issue may be referred to the Chief Executive Officer. At any point in this process, the individual may also write to the Privacy Commissioner.

- b. Contact Information:

Community Social Services Employers' Association of BC (CSSEA)  
Suite 800  
Two Bentall Centre  
555 Burrard Street  
Box 232  
Vancouver BC V7X 1M8  
Attention: Privacy Officer

Email: [privacyofficer@cssea.bc.ca](mailto:privacyofficer@cssea.bc.ca)